

42-045-00070



February 21, 2012

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**Re: Notice of Changes to Due Dates of Corrective Actions for Acid Gas / Tail Gas RCA at ConocoPhillips Trainer Refinery
Civil Action No. H-05-0258**

This letter is to notify EPA that the target completion date for the Acid Gas / Tail Gas RCA action item below has been changed from 6/30/2012 to six months after refinery startup. To implement the action item a Sulfur Recovery Plant shutdown during a refinery turnaround is required. On September 29, 2011, the Trainer Refinery was idled in preparation for sale or permanent shut down. In the event that the Trainer Refinery is restarted and continues to operate, the action item below will be completed. The Acid Gas/Tail Gas RCA action listed below will have a new completion due date to coincide with a refinery startup.

EVENT DATE	ROOT CAUSE	ACTION ITEM	ORIGINAL DUE DATE	NEW DUE DATE
5/24/2008	SRU Train # 2 Sulfur Soak	Install instrumentation such as oxygen and/or hydrogen analyzers in the sulfur unit to direct the gas from sulfur soak to SCOT unit instead of the incinerator to minimize emissions of sulfur oxide during a sulfur soak.	8/31/2011; Due date changed to 6/30/12 to coincide with refinery turnaround.	6 Months after Refinery Startup

For questions regarding this submittal, please contact Colin Franks at (610)-364-8120.

Very truly yours,

Colin J. Franks

cc:

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